

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: Draft – March 27, 2019

Region: Mooresville Regional Office
County: Catawba
NC Facility ID: 1800044
Inspector's Name: Bob Caudle
Date of Last Inspection: 11/01/2018
Compliance Code: 3 / Compliance - inspection

Facility Data Applicant (Facility's Name): Century Furniture – Plant No. 1 <i>Legal Name: Century Furniture, LLC</i> Facility Address: Century Furniture - Plant No. 1 420 12th Street NW Hickory, NC 28601 SIC: 2511 / Wood Household Furniture NAICS: 337122 / Nonupholstered Wood Household Furniture Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V				Permit Applicability (this application only) SIP: 15A NCAC 02D .1806 (Added) & 02Q .0513 NSPS: N/A NESHAP: N/A PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: RENEWAL ONLY – NO MODIFICATIONS			
Contact Data				Application Data Application Number: 1800044.18A Date Received: 02/21/2018 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 03918/T23 Existing Permit Issue Date: 02/14/2017 Existing Permit Expiration Date: 12/31/2018			
Facility Contact Dennis Tart Environmental Engineer (828) 326-8376 PO Box 608 Hickory, NC 28603	Authorized Contact Brandon Mallard Plant Manager (828) 326-8384 PO Box 608 Hickory, NC 28603	Technical Contact Dennis Tart Environmental Engineer (828) 326-8376 PO Box 608 Hickory, NC 28603					
Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2017	0.9400	18.79	99.91	22.87	15.26	9.04	4.25 [Toluene]
2016	0.8800	17.56	96.31	21.38	14.19	9.01	3.99 [Toluene]
2015	0.8400	16.77	115.05	20.40	14.01	10.44	5.65 [Toluene]
2014	0.6800	13.87	105.39	16.81	12.10	9.08	5.10 [Toluene]
2013	0.6500	13.37	98.18	16.14	11.37	8.46	4.73 [Toluene]
Review Engineer: Judy Lee Review Engineer's Signature: _____ Date: _____				Comments / Recommendations: Issue: 03918/T24 Permit Issue Date: _____ Permit Expiration Date: _____			

I. Purpose of Application

This permitting action is for the following:

1. Renewal of an existing Title V permit pursuant to 02Q .0513. Century Furniture – Plant No. 1 (Century) currently holds existing Title V permit (**03918T24**) issued on **February 14, 2017**, and expires on **December 31, 2018**. The renewal application was received on **February 21, 2018** in the Mooresville Regional Office (MRO). The Division of Air Quality (the Division or DAQ) Raleigh Central Office (RCO) received the application on **February 23, 2018**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit will remain in effect until the renewed permit has been issued or denied.

II. Facility Description

Per the latest inspection report dated November 1, 2018 conducted by Mr. Robert Caudle, MRO: This facility manufactures and finishes occasional furniture, case goods and tables. This facility operates 8 hours per day; 5 days per week; 50 weeks per year. The hours and days of operations fluctuate depending on product orders. The facility employs 325 people.

Per Form A – General Facility Information submitted with the renewal application:

“The facility manufactures primarily wood furniture and applies stains, lacquers, and other finishing materials per customer requests. In addition to wood furniture, metal furniture items maybe finished as well. Furniture is dried in ovens utilizing steam or natural gas drying systems. Boiler steam is generated for select ovens providing building space heat.”

➤ Facility name/address/legal name/responsible official check:

IBEAM compared with Renewal application submittal:

Site Name per application is Century Furniture – Plant 1; however, IBEAM has Century Furniture – Plant No. 1. Plant No. 1 is correct.

- ✓ NC Department of the Secretary of State Corporation search: <https://www.sosnc.gov/> compared with **IBEAM**:

Legal Corporate/Owner Name is *Century Furniture, LLC*

- ✓ **IBEAM** list Brandon Mallard, Plant Manager as the Responsible Official (RO); same as the Renewal application submittal – Form A. The last inspection report also has Mr. Mallard as the RO on record.

III. Compliance History/Statement

During the most recent compliance inspection performed on November 1, 2018, Mr. Caudle, MRO, indicated that the facility appeared to be in compliance with the applicable air quality regulations and Air Quality Permit No. 03918T23.

In accordance with the provisions of 15A NCAC 2Q .0520 and .0515(b)(4) the Responsible Official, Mr. Brandon Mallard, Plant Manager, has signed the required Title V Compliance Certification - Form E5 dated February 19, 2018.

IV. History/Background/Application Chronology

Please see the attached Comprehensive Application Report for 1800044.18A and email correspondence for more details.

XXXX, 2019 – DRAFT permit sent to 30-day public notice and 45-day EPA review. Public notice period ended XXXX, 2019. No comments were received. EPA review period ended XXXX, 2019.

March 27, 2019 – Comments received from Mr. Parekh, SSCB on DRAFT permit and review.

March 26, 2019 – Comments received on DRAFT renewal permit and review from Mr. Foutz, MRO.

March 26, 2019 – Comments received from Permittee on DRAFT permit.

March 22, 2019 – DRAFT renewal permit and review sent to Ms. Jennifer Womick/Mr. Joe Foutz, Mooresville Regional Office (MRO) for review and comment.

March 22, 2019 – DRAFT renewal permit and review sent to Mr. Samir Parekh, Stationary Source Compliance Branch (SSCB) for review and comment.

March 22, 2019 – DRAFT renewal permit sent to Permittee for comment prior to public notice and EPA review.

March 15, 2019 – Comments on DRAFT renewal permit and review from Supervisor.

March 8, 2019 – DRAFT renewed permit and review sent to Supervisor for comments.

February 18, 2019 – Email response from Mr. Voelker, RCO regarding Boiler MACT language for the boilers at Century.

February 12, 2019 – Email from RCO to Century Furniture regarding renewal application assignment, changes and boiler information.

February 5, 2019 – Email to Mr. Joe Voelker, RCO requesting Boiler MACT language for the boilers at Century.

June 18, 2018 – Request from the applicant to add wash off tank and associated activities as an insignificant source received in RCO.

February 21, 2018 – Renewal application received in Mooresville Regional Office (MRO).

V. Permit Modifications/Changes and Title V Equipment Editor (TVEE) Discussion

Proposed Equipment Changes

Equipment to be ADDED:

Emission Source ID No.	Emission Source Description
I-WOT-1 (MACT Subpart JJ)	Wash off tank used to remove finishes/materials from large furniture items due to defects such as “off shade”, scratches, etc.

Equipment to be MODIFIED: *none*

Equipment to be REMOVED: *none*

The following table describes the modifications to the current permit as part of this renewal:

Page No.	Section	Description of Changes
Cover Letter	N/A	<ul style="list-style-type: none"> Updated cover letter with application number, permit numbers, dates, fee class and new letterhead Updated authorized contact information for the facility Added PSD class and increment statement
Attachment	Insignificant activity list	<ul style="list-style-type: none"> Added Wash Off Tank per June 18, 2018 request
Attachment	Table of Changes	<ul style="list-style-type: none"> Revised for changes made to permit for this renewal
Permit Cover	N/A	<ul style="list-style-type: none"> Inserted new issuance and complete application date, application number, facility information
Page 3	Section 1	<ul style="list-style-type: none"> Added MACT JJJJJ and updated Case by Case reference Revised control device configuration for the woodwaste handling and storage system (ID No. S1) Removed asterisks and footnote for SP-1 added as a minor modification and became final on April 14, 2017
Permit – Globally	Section 2 and Section 3	<ul style="list-style-type: none"> Updated regulation references from “2D” and “2Q” to “02D” and “02Q” to be consistent with regulation nomenclature Updated with shell revisions
Pages 8 – 11	Section 2.1 - C	<ul style="list-style-type: none"> Replaced MACT Subpart JJJJJ for Wood-fired boilers with condition provided by Mr. Joe Voelker, RCO
Pages 16 – 19	Section 2.2 - A	<ul style="list-style-type: none"> Updated MACT Subpart JJ condition with latest shell revisions
Page 21	Section 2.2 - D	<ul style="list-style-type: none"> Added 02D .1806 Odors Rule – This rule has been inadvertently omitted from this facility
Pages 22 – 31	Section 3	<ul style="list-style-type: none"> Updated General Conditions (Version 3.6 01/31/12 replaced with Version 5.3, 08/21/2018)

Modifications to TVEE were required as a result of this renewal.

TVEE changes were reviewed and approved on XXXXX. See Permit Modification Tracking slip for confirmation.

VI. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 02D .0503 “Particulates from Fuel Burning Indirect Heat Exchangers”
 15A NCAC 02D .0504 “Particulates from Wood Burning Indirect Heat Exchangers”
 15A NCAC 02D .0512 “Particulates from Miscellaneous Wood Products Finishing Plants”
 15A NCAC 02D .0516 “Sulfur Dioxide from Combustion Sources”
 15A NCAC 02D .0521 “Control of Visible Emissions”
 15A NCAC 02D .0524 “New Source Performance Standards”
 15A NCAC 02D .1111 “Maximum Achievable Control Technology” and “Generally Achievable Control Technology” [40 CFR Part 63 Subpart JJ & Subpart JJJJJ]
 15A NCAC 02D .1806 “Control and Prohibition of Odorous Emissions” [Added]
 15A NCAC 02Q .0317 “Avoidance Conditions”
 15A NCAC 02Q .0711 “Emission Rates Requiring a Permit”

An extensive review for each applicable regulation is not included in this document, as the facility’s status with respect to these regulations has not changed as part of this renewal. However, 02D .1111, 40 CFR Part 63, Subpart JJJJJ (boiler MACT) will be modified significantly and 02D .1806 (Odors) will be added during this renewal. For some regulations below, more discussion is provided for clarification and background, where necessary. The permit will be updated to reflect the most current stipulations for all applicable regulations.

15A NCAC 02D .0503 “Particulates from Fuel Burning Indirect Heat Exchangers”

Natural gas-fired boilers ES-B1NG & ES-B2NG are subject to 40 CFR 60, Subpart Dc, but this NSPS does not have a particulate standard for natural gas-fired units. Therefore, these boilers are subject to the 02D .0503 regulation. This regulation limits the allowable amount of particulate emissions (PM) from a boiler as a function of the facility-wide heat input capacity. Once a limit is determined, it will not be revised upwards or downwards if the facility-wide heat input capacity changes. The formula to determine the allowable emission rate is:

$$E = 1.090 \times Q^{-0.2594}$$

Where:

E = The allowable particulate emission rate, in pounds per million Btu heat input
 Q = The facility-wide maximum heat input, in million Btu per hour

Based on the T23 permit, the allowable emission limit (*E*) for all boilers at the facility is 0.39 pounds per million Btu (lbs/million Btu). The total heat input for the facility (*Q*) includes boilers ES-B4 (20.7 million Btu/hr heat input capacity) and boilers ES-B1NG & ES-B2NG (16.75 million Btu/hr each) to establish the allowable emission limit. Thus *Q* was equal to 54.2 million Btu/hr. ES-B4 was removed from the facility in that same T23 revision of the permit.

Also, based on the most recent inspection, the boiler plate for these boilers list a heat input capacity of 16.738 million Btu per hour each. They were manufactured in 1988. The heat input values will be changed in the permit to match the correct boiler plate rating for these boilers. The correction of the heat input values does not change the allowable particulate emission limit of 0.39 pounds per million Btu heat input.

The emission factor for natural gas (NG) combustion is 0.007 lbs/million Btu per Table 1.4-2 of US EPA, AP-42. Thus, very little particulate is produced from NG combustion. Therefore, no monitoring, recordkeeping, or reporting (MRR) is required to show compliance with the regulation.

No changes to the permit stipulation are required.

15A NCAC 02D .0504 “Particulates from Wood Burning Indirect Heat Exchangers”

The wood fired boiler (ID No. ES-B2) is subject to 02D .0504. Allowable PM emissions are determined from the equation $E = 1.1698(Q)^{-0.2230}$, where E equals the allowable emission limit for PM (in pounds per million Btu) and Q equals the maximum heat input in million Btu per hour. The Q for the wood fired boiler includes 36 million Btu/hr heat input of boiler ES-B1, which has since been removed from the facility. With a Q of 74.4 million Btu per hour ($Q = 36 + 38.4$), the PM emission limit for the wood fired boiler is 0.45 pounds per million Btu.

In addition to inspection and maintenance requirements, Century Furniture is currently required to conduct PM emission testing once per permit term to demonstrate compliance with 02D .0504. The following table summarizes the historical PM emission testing conducted on boiler ES-B2.

Test Date	PM Emission Rate Measured During Testing (lb/mm Btu)	Percent of limit	Allowable Emission Rate (lb/mm Btu)
03/14/2018	0.334	74.2	0.45
05/19/2010	0.397	88.2	
01/14/2010	0.42	93.3	
12/03/2009	0.57 (NOV)	126.7	
04/10/2001	0.432	96	

With the exception of the most recent particulate test, PM emission rates have historically been greater than 85% of the allowable limit. The DAQ is currently in the process of establishing suggested testing frequencies for wood-fired boilers. The testing cycle will remain at once a permitting cycle in the permit until the Agency decides to do otherwise.

No other changes to the monitoring, recordkeeping, or reporting requirements (MRRR) are needed under this renewal.

15A NCAC 02D .0512 “Particulates from Miscellaneous Wood Products Finishing Plants”

This regulation requires that facilities provided adequate particulate control for wood finishing processes.

The furniture finishing operation (ID No. SP-1), the woodwaste handling and storage system (ID No. S1), wood dust storage bin transfer operations (ID No. WDSBT), wood hog (ID No. S2), wood dust fuel trailer unloading operations (ID No. WDTU), woodworking operation (ID No. S3), and woodworking equipment (ID No. ES-W1) are subject to 02D .0512.

In order to demonstrate compliance, all of the particulate control devices (such as filters and cyclones) must be regularly inspected and maintained. Records of maintenance must be kept and reported twice per year.

Based on the most recent inspection, Century appears to be in compliance with the regulation. Based on the latest inspection report per IBEAM, Century has been submitting the required reports. Continued compliance will be determined during the next inspection.

No changes to the MRRR are required.

15A NCAC 02D .0516 “Sulfur Dioxide from Combustion Sources”

This regulation limits SO₂ emissions from combustion sources to 2.3 pounds emitted per million Btu heat input.

The only combustion sources on the permit are the three boilers. Two NG and one wood (Sulfur content in wood is normally less than 0.1 percent) fired; both fuels are inherently low in sulfur. Continued compliance is expected.

There are no MRRR. No changes to the permit stipulation are required.

15A NCAC 02D .0521 “Control of Visible Emissions”

This regulation limits visible emissions (VE).

The following equipment was manufactured and operating as of July 1, 1971 and must not have visible emissions of more than 40 percent opacity when averaged over a six-minute period, except as specified in 15A NCAC 02D .0521(c):

- Spray booths (ID Nos. SP-1-SB-1 through SP-1-SB-28) - To ensure compliance with 02D .0521, the facility is required to conduct monthly visible emission observations.
- Woodwaste handling and storage system (ID No. S1) and wood hog (ID No. S2) and associated controls - To ensure compliance with 02D .0521, the facility is required to conduct weekly visible emission observations.

The following equipment was manufactured after July 1, 1971 and must not have visible emissions of more than 20 percent opacity when averaged over a six-minute period, except as specified in 15A NCAC 02D .0521(d).

- Natural gas-fired boilers (ID Nos. ES-B1NG and ES-B2NG) - No monitoring, recordkeeping, or reporting is required when firing natural gas in these boilers.
- Wood fired boiler (ID No. ES-B2) - To ensure compliance with 02D .0521, the facility is required to conduct daily visible emission observations.
- Spray booths (ID Nos. SP-1-SB-30 through SP-1-SB-32) - To ensure compliance with 02D .0521, the facility is required to conduct monthly visible emission observations.
- Woodwaste handling and storage system (ID No. S1), wood dust storage bin transfer operations (ID No. WDSBT), wood dust fuel trailer unloading operations (ID No. WDTU), woodworking operation (ID No. S3), and woodworking equipment (ID No. ES-W1) - To ensure compliance with 02D .0521, the facility is required to conduct weekly visible emission observations.

Per the most recent inspection, there have been no VE violations or complaints against the facility. Based on IBEAM, Century has been submitting the required reports. Continued compliance will be determined during subsequent inspections.

No changes to the permit stipulations are required; however, during this renewal the conditions were revised with the most up to date condition which has new line items that were not in the previous condition.

15A NCAC 02D .0524 “New Source Performance Standards (NSPS)”

Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Source: 72 FR 32759, June 13, 2007, unless otherwise noted.

§ 60.40c Applicability and delegation of authority.

(a) Except as provided in paragraphs (d), (e), (f), and (g) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is

commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).

...

Per §60.48c(g), the facility must record and maintain records of the amounts of each fuel combusted during each month for the boiler(s). The records must be maintained on-site for a period of two (2) years. Additionally, the facility must submit the fuel usage records for each six-month period within 30 days after the end of each period.

The two natural gas-fired boilers (ID Nos. ES-B1NG and ES-B2NG) are permitted at 16.738 million Btu/hr; thus, subject to 40 CFR Part 60, NSPS, Subpart Dc. However, Subpart Dc does not specify an emission limit for natural gas-fired sources; therefore, the facility is only required to keep fuel records.

Based on the most recent inspection, the facility has submitted all required notifications and are maintaining monthly records of the amount of NG combusted.

A revised condition provided by Mr. Joe Voelker, RCO, via email on February 18, 2019 was placed in the revised permit (Refer to NSPS under Section VII).

15A NCAC 02D .1111 “Maximum Achievable Control Technology (MACT)” and “Generally Achievable Control Technology (GACT)” [40 CFR Part 63 Subpart JJ & Subpart JJJJJJ]

The facility is subject to the following MACTs/GACTs:

- National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Industrial, Commercial, and Institutional Boilers, 40 CFR 63, Subpart JJJJJJ.

Two natural gas-fired boilers (ID Nos. ES-B1NG and ES-B2NG)

Based on the most recent inspection, the boiler plate for these boilers list a heat input capacity of 16.738 million Btu per hour each. They were manufactured in 1988. The heat input capacity will be corrected in this renewal permit.

Per 40 CFR 63.11195(e), these boilers have no applicable requirements under the boiler GACT.

One wood fuel-fired boiler (ID No. ES-B2) and associated multicyclone (ID No. CD2)

Based on the most recent inspection, this unit was manufactured in 1978. The heat input was not listed on the boiler plate. This boiler is currently permitted at 38.4 million Btu per hour heat input.

- NESHAP for Wood Furniture Manufacturing Operations, 40 CFR Part 63 Subpart JJ.

Wood finishing operations (ID No. SP-1)

Based on the most recent inspection report the facility is in compliance. The regulatory language in the permit was updated to the most recent shell changes.

Excerpt from inspection report April 2, 2018

15A NCAC 02D .1111: 40 CFR 63, Subpart JJJJJJ –

Observed. The initial notification was submitted on July 16, 2013. The energy assessment was conducted in October 2013. The first compliance report was submitted in CEDRI on July 7, 2014. The most recent biennial tune-up occurred on June 23, 2016. The next biennial tune-up is due by July 23, 2018. The most recent report was submitted on January 23, 2018. The facility conducts daily inspections of the wood boiler and the most recent annual internal inspection occurred on July 1, 2017. There have not been any equipment malfunctions since the last inspection. Compliance is indicated.

15A NCAC 02D .1111: 40 CFR 63, Subpart JJ –

Observed. This facility is using a generic work practice implementation plan, which was developed by the American Furniture Manufacture Association (AFMA) for its member companies. The plan has not been revised since original adoption. The training records of random spray operators were checked during the inspection. Mr. Tart was able to provide written documentation to confirm that each spray booth operator had been trained annually as required.

Observed. The facility appears to be following good housekeeping practices to comply this stipulation and reduce air pollutants. The facility has submitted reports on July 21, 2017 and January 23, 2018. Compliance is indicated.

Observed. Random coatings were selected to determine compliance. Mr. Tart provided documentation to show that the coatings were below the emission limits. Stains #506-517 and 506-1207 contain 0.0 lb VHAP/lb solids; Washcoat #370-1446 contains 0.70 lb VHAP/lb solids; Sealer 370-2264 contains 0.01 lb VHAP/lb solids. The facility mostly uses acetone as their thinner. All product usage and emissions records are being maintained as required. The facility has added a number of small quantity coatings. In 2017, the facility used 33,416 gallons of Akzo products and 378 gallons of Chair City products. The new products records were reviewed and were found to comply with the VHAP/solids limits. The last semi-annual reports were submitted on July 21, 2017 and January 23, 2018. Compliance is indicated.

Observed. The facility uses strippable coatings to protect the walls of the booth and to make clean-up easier. The coating can be easily peeled from the booth when it's time to be replaced. Coating #372-W5W-1381 is the strippable coating used by the facility. It contains 0.598 lb VOC per lb solids. The facility is maintaining the necessary records to demonstrate compliance. The facility submitted reports on July 21, 2017 and January 23, 2018. Compliance is indicated.

Observed. The facility does not use foam or other contact adhesives. The facility uses wood adhesives. The required records were reviewed and were found to be in order. The facility provided SDS documents indicating that all the adhesives have less than 1 lb VHAP per pound solids. The facility submitted reports on July 21, 2017 and January 23, 2018. Compliance is indicated.

Observed. The facility is complying with Option #1. For January to December 2017, the facility used 19.6 lb/yr of formaldehyde. The facility submitted reports on July 21, 2017 and January 23, 2018. Compliance is indicated.

15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions"

This regulation states that facilities must not emit odors that contribute to objectionable odors beyond the facility's property boundary.

This facility has not previously been subject to 02D .1806; however, due to the type of sources this regulation is applicable. It appears this regulation has inadvertently been omitted in the processing of previous permitting applications. The odors regulation will be added during this renewal for consistency with similar Title V facilities of this nature.

15A NCAC 02Q .0317 “Avoidance Conditions”

Century Furniture requested a Hazardous Air Pollutant (HAP) Minor limitation be place in their permit during a previous modification to avoid being Major and subject to Maximum Achievable Control Technology (MACT) standards. By accepting an avoidance limit for 15A NCAC 02D .1109, 112(j) Case-by-Case MACT, HAP emissions from the following sources must be less than 10 tons per year (tpy) of any single HAP and less than 25 tpy of combined HAPs:

The two natural gas-fired boilers (ID Nos. ES-B1NG and ES-B2NG)
One wood fuel-fired boiler (ID No. ES-B2) and associated multicyclone (ID No. CD2)
One furniture finishing operation (ID No. SP-1)

Excerpt from inspection report April 2, 2018

Observed. The facility is maintaining the required monthly records. The 2017 12-month rolling HAP total was 8.64 tons HAPs. Compliance is indicated.

Observed. The facility submitted reports on July 21, 2017 and January 23, 2018. Compliance is indicated.

15A NCAC 02Q .0711 “Emission Rates Requiring a Permit”

The facility has no 02D .1100 limits in their permit. However, their permit contains a 02Q .0711 condition for ammonia and n-hexane as discussed in Section VIII below.

VII. NSPS, MACT/GACT, PSD/NSR, 112(r), CAM:

NSPS

The facility is currently subject to New Source Performance Standards (NSPS) for their NG-fired boilers.

As discussed under Section VI above, the two NG-fired boilers (ID Nos. ES-B1NG and ES-B2NG) are subject to 40 CFR Part 60, Subpart Dc “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.” This condition was modified per Mr. Voelker, RCO.

This permit renewal does not affect this status.

MACT/GACT

During the last renewal cycle Century requested a less than 10/25 tpy HAP avoidance limit to avoid being a Title III Major facility. Century is subject to the Furniture MACT (Subpart JJ) and the Boiler GACT (Subpart JJJJJ).

The facility is not subject to MACT Subpart ZZZZ (RICE NESHAP). According to Mr. Tart, the facility does not have any generators or fire pump engines.

This permit renewal does not affect this status.

PSD/NSR

The facility is not considered a major facility for Prevention of Significant Deterioration (PSD).

The Catawba County PSD Minor Source Baseline was triggered for PM₁₀ as of 07/21/78 by Century Furniture.

112(r)

The facility does not store materials subject to Section 112(r) of the Clean Air Act (CAA) above the thresholds listed in that regulation.

CAM

15A NCAC 02D .0614 [40 CFR Part 64] COMPLIANCE ASSURANCE MONITORING (CAM) – Based on previous CAM applicability determinations, none of the control devices at the facility meet the criteria for CAM applicability. In addition, per Form E6 – Compliance Assurance Monitoring Plan submitted with the renewal application, the facility indicated “Not applicable”.

VIII. Toxic Air Pollutants

Century’s primary operations are wood furniture manufacturing and combustion sources, which are exempt per 15A NCAC 02Q .0702 EXEMPTIONS (a)(18), (23) and (27), as toxics emission sources because they are subject to MACT/GACT Subpart JJ and Subpart JJJJJ.

During the previous renewal cycle (issued permit T22), emissions of ammonia and n-hexane were compared against their respective toxic permitting emissions rate (TPER). Neither TAP exceeds its TPER; however, a condition was added to the permit at that time specifying that a permit to emit n-hexane and ammonia in quantities above the TPER requires the submittal of a permit application.

This permit renewal does not affect this status.

IX. Facility Emissions Review

Several years of emission data are included in the table on the first page of this review. The changes made during this permit renewal are not expected to change the facility's potential or actual emissions.

X. Compliance Status

- a. Notices of Violation/Recommendation for Enforcement since the previous renewal:

None noted.

- b. Inspection status based on most recent inspection report dated November 1, 2018:

The Regional Inspection stated that “based on my observations during this inspection, this facility appeared to be in compliance with the applicable air quality regulations.”

- c. Other compliance requirements and issues:

None noted.

XI. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be

provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. The States of South Carolina and Mecklenburg County Local Programs are affected state/local programs within 50 miles of the facility.

The following comments were received: XXXX.

XII. Conclusions, Comments, and Recommendations

Professional Engineering Seal

A Professional Engineer's Seal (PE Seal) is NOT required for this permit renewal.

Zoning Consistency Determination

A consistency determination is NOT required for this permit renewal.

MRO was presented a copy of this Draft permit for review and has recommended that the permit be issued.

RCO concurs with MRO's recommendation to issue this renewal permit.